

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

UNITED STATES OF AMERICA

Plaintiff,

VS.

CHIQUITA SMITH

Defendant.

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DOCKET NO. 2:12cr020-MHT

MOTION TO CONTINUE

COMES NOW the defendant, by and through her attorney, and moves this Honorable Court to continue the above-styled cause now set for plea on April 30, 2012. As grounds counsel would show unto the Court the following:

1. That counsel is scheduled to be in trial in the matter of *State of Alabama vs. Tommy Paige*, CC-2008-337 and *State of Alabama vs. Charles Smith*, CC-2008-382 in Marengo County on Monday, April 30th, at 9:00 a.m.
2. That the matters in Marengo County have been pending for some time.
3. That counsel is scheduled for trial in the matter of JU-2008-140.04 in Montgomery County on Tuesday, May 1st, at 9:00 a.m. This matter is a continuation of a previous trial.
4. That a continuance of this matter would not prejudice the government and would benefit the defendant.
5. That the U.S. Attorney's Office (Brent Woodall) has no objection to a continuance of this matter.
6. That both counsels can be available on Wednesday, May 2nd.

WHEREFORE, the premises considered, counsel for the defendant respectfully request a continuance in the above-styled cause and reschedule the same for Wednesday, May 2nd.

Respectfully submitted this 26th day of April, 2012.

/s/Valerie Murry Smedley

VALERIE MURRY SMEDLEY **SME003**
Attorney for Defendant Chiquita Smith

ADDRESS OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion to Continue upon the Honorable Brent Woodall, Assistant U.S. Attorney, by electronically filing a copy with the Clerk of the Court using the CM/ECF system on this the 26th day of April, 2012.

/s/Valerie Murry Smedley

VALERIE MURRY SMEDLEY
Attorney for Defendant Chiquita Smith